

## **EXHIBIT A**



X 13—Notice of Claim against The City of New York:  
Section 50e General Municipal Law. 6-83

JULIUS BLUMBERG, INC., PUBLISHER  
62 WHITE STREET, NEW YORK, N. Y. 10013

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CITY OF NEW YORK

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COMMUNICATIONS SECTION  
CENTRAL IMAGING FACILITY  
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*In the Matter of the Claim of*

BENJAMIN CRUZ

*against*

**THE CITY OF NEW YORK**

**TO: COMPTROLLER OF THE CITY OF NEW YORK**

**PLEASE TAKE NOTICE** that the undersigned claimant(s) hereby make(s) claim and demand against the City of New York, as follows: [Office of the Comptroller requests the following additional information: in Section 2, specific defect (e.g. pothole) if applicable; in Section 3, street address wherever possible.]

**1. The name and post-office address of each claimant and claimant's attorney is:**

Benjamin Cruz  
150 Linden Street, Apt. 4D  
Brooklyn, NY 11221

Donald E. Cameron, Esq.  
139 Fulton Street, Suite 510  
New York, NY 10038

**2. The nature of the claim:**

assault, false imprisonment, harassment, violation of civil rights, negligent hiring, supervision and training, and negligence

**3. The time when, the place where and the manner in which the claim arose:**

On or about 2/7/15, at about 11:30 pm, inside 150 Linden Street, Bklyn, NY, Claimant Benjamin Cruz was assaulted, without provocation or justification, by two or more police officers or other police personnel. Other police officers or other police personnel were present during the occurrence of said assault, were in close proximity to & were watching the occurrence of said assault, & did nothing to prevent or to stop said assault upon Claimant. The acts constituting said assault include, without limitation, police officers or other police personnel: throwing & tossing Claimant down the hallway from outside Apt 4D at above location; throwing & tossing Claimant onto the walls & floor in said hallway; kicking Claimant about his head & body; stepping & stomping on Claimant about his head & body, including Claimant's back; extremely tightly handcuffing Claimant's wrists behind his back, causing cuts, bruises & swelling of Claimant's wrists. As a result of the said assault, Claimant was taken to the emergency room at Woodhull Hospital, Bklyn, NY, by ambulance (i.e., FDNY EMS), & was escorted in the ambulance to the hospital by one or more of the police officers or other police personnel who participated in &/or observed said assault. Due to the within incident, Claimant required & received medical treatment while in police custody. One or more of the police officers or other police personnel falsely reported the cause of Claimant's injuries, blaming Claimant for his own injuries & thereby falsely exonerating themselves & their fellow police officers &/or other police personnel. Claimant's physical injuries include, without limitation: head injuries requiring CAT scan, contusions, bruises, cuts, bleeding, pain & suffering. Claimant also suffered loss of liberty & economic injury. No charges were filed against Claimant. NYC & one or more employees &/or agents of the NYC Police Department (i.e., at least 5 or 6 individuals) are responsible for the above illegal conduct against Claimant & for Claimant's injuries.

**4. The items of damage or injuries claimed are (include dollar amounts)**

assault, loss of liberty, false imprisonment, illegal search, harassment, deprivation of civil rights, damage to reputation, severe emotional distress, physical injury; damages claimed -- \$1,000,000.00.

**TOTAL AMOUNT CLAIMED**

( \$ 1,000,000.00 )

The undersigned claimant(s) therefore present this claim for adjustment and payment. You are hereby notified that unless it is adjusted and paid within the time provided by law from the date of presentation to you, the claimant(s) intend(s) to commence an action on this claim.

Dated: 4-1-15

*Benjamin Cruz*

The name signed must be printed beneath

BENJAMIN CRUZ

The name signed must be printed beneath

*Donald E. Cameron*

Attorney(s) for Claimant(s)

Office and Post Office Address, Telephone Number

DONALD E. CAMERON, Esq.  
139 Fulton Street, Suite 510  
New York, NY 10038  
(212) 233-3348

**INDIVIDUAL VERIFICATION**

State of New York, County of New York ss.:  
Benjamin Cruz

being duly sworn, deposes and says that deponent is the claimant in the within action; that he has read the foregoing Notice of Claim and knows the contents thereof; that the same is true to deponent's own knowledge, except as to the matters therein stated to be alleged on information and belief, and that as to those matters deponent believes it to be true.

*Donald E. Cameron*

Sworn to before me, this 1st  
day of April

2015  
DONALD E. CAMERON  
Notary Public, State of New York  
No. 31-4820921  
Qualified in New York County  
Commission Expires October 31, 2018

**CORPORATE VERIFICATION**

State of New York, County of ss.:

being duly sworn, deposes and says that deponent is the  
of

corporate claimant named in the within action; that deponent has read the foregoing Notice of Claim and knows the contents thereof, and that the same is true to deponent's own knowledge, except as to the matters therein stated to be alleged upon information and belief, and as to those matters deponent believes it to be true.

This verification is made by deponent because said claimant is a corporation, and deponent an officer thereof, to wit its  
The grounds of deponent's belief as to all matters not stated upon deponent's knowledge are as follows:

Sworn to before me, this  
day of

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In the Matter of the Claim of

against

THE CITY OF NEW YORK

Notice of Claim Against  
the City of New York

Attorney(s) for Claimant(s)  
Office and Post Office Address